

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	No. 4:24-cv-473
v.	§	
\$2,468,460.39 in US Currency	§	
Defendant in Rem.		

**CLAIMANT ALEC PROSTOK'S
ANSWER TO COMPLAINT FOR FORFEITURE IN REM**

NOW COMES Claimant Alec Prostok, by and through his attorneys of record, and files this Answer to the Verified Complaint for Forfeiture In Rem pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, stating as follows:

ANSWER

With regard to the following paragraphs in Plaintiff's Verified Complaint, identified by paragraph number, the Claimant answers as follows:

Nature of the Action

1. Paragraph 1 states legal conclusions which do not require Claimant to admit or deny. To the extent that Plaintiff alleges that the property in rem constitutes or is derived from proceeds traceable to or substantially connected with a violation of federal law, Claimant denies this allegation.

Jurisdiction and Venue

2. Admitted.
3. Admitted.

Parties

4. Admitted.

5. Admitted.

6. Admitted.

Facts

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted. In addition to the wallet on the SOL blockchain identified in Paragraph 11, Claimant notes that eight other cryptocurrency wallets were compromised at the same time and were subsequently controlled by the same fraudster. The other wallets contained 47,435.24 Raydium (“RAY”), 34,897 USDC, 152,294.38 Serum (“SRM”), 184,663.34 Mango (“MNGO”), and an additional 3,424.57 SOL tokens.

12. Admitted.

13. Admitted.

14. Admitted.

15. Admitted.

16. Admitted. In addition to the SOL referenced in Paragraph 16, the fraudster also transferred the other cryptocurrencies identified above in the Answer to Paragraph 11 from Hekla’s wallets to other wallets that the fraudster controlled.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted. In addition to the transfers identified in Paragraph 21, Wallet Three and Wallet Four also received transfers of converted cryptocurrencies that had been stolen from Hekla's wallets, as referenced in the Answer to Paragraph 11.

22. Admitted.

23. Admitted.

24. Admitted.

25. Admitted.

26. Admitted. The graph provided by Blocktrace tracks both the transfers identified in the Complaint as well as the transfers identified as a supplement in Claimant's Answer Paragraphs 11, 16, and 21.

27. Admitted.

28. Claimant has no basis to admit or deny these allegations in Paragraph 28.

29. Claimant has no basis to admit or deny these allegations in Paragraph 29.

30. Claimant has no basis to admit or deny these allegations in Paragraph 30.

31. Claimant has no basis to admit or deny these allegations in Paragraph 31.

32. Claimant has no basis to admit or deny these allegations in Paragraph 32.

32. Claimant has no basis to admit or deny these allegations in Paragraph 33.

34. Claimant has no basis to admit or deny these allegations in Paragraph 34.

35. Admitted.

36. Claimant has no basis to admit or deny these allegations in Paragraph 36.

37. Admitted.

38. Admitted.

39. - 50. Paragraphs 21, 22 and 23 do not require Claimant to admit or deny.

Respectfully submitted,

/s/ _____
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Counsel for Claimant Alec Prostok

Certificate of Service

I, Arnold Spencer, counsel of record for Claimant Alec Prostok, do hereby certify that I have filed the foregoing document with the Clerk of Court via the ECF system, which sent notice to all counsel of record, in accordance with the Federal Rules of Criminal Procedure.

Dated: June 4, 2024

/s/ Arnold A. Spencer
Arnold A. Spencer
Counsel for Claimant Alec Prostok

VERIFICATION

I have read the contents of the Verified Complaint for Forfeiture in Rem and verify under penalty of perjury pursuant to 28 USC Section 1746 that the statements in this Answer in reply to the Verified Complaint are true and correct to the best of my knowledge and belief.

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Alec Prostok